



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 14, 2023

VIA ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. The Government shall submit their opposition brief on or before August 16, 2023, and the Defendant shall submit their reply on or before September 6, 2023. It is FURTHER ORDERED that the status conference currently scheduled for July 7, 2023 is adjourned to September 14, 2023 at 1:00pm. I exclude the time between now and September 14, 2023 under the Speedy Trial Act, as I find that it is in the interest of justice to do so. SO ORDERED.

Re: *United States v. Andrew Franzone*, 21 Cr. 446 (VSB)

6/15/2023

Dear Judge Broderick:

The Government submits this joint letter to respectfully request an adjournment of the motions schedule for the defendant's pending motion to suppress the fruits of a Google search warrant. The defendant filed his motion to suppress on May 25, 2023. (Dkt. 81). The Government's opposition brief is presently due June 23, 2023 and the defendant's reply brief is due July 7, 2023. (Dkt. 78). However, due to the parties' other case-related obligations, including defense counsel's participation in a multi-week trial in July 2023, the parties respectfully request the Court adjourn the schedule to allow the Government to file its opposition brief on August 16, 2023 and the defendant to file his reply on September 5, 2023.

The Government further requests that the Court adjourn the status conference currently scheduled for July 7, 2023 to a date after the motion has been fully briefed. The Government further requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), through the new conference date, in the interests of justice and to allow for the completion of briefing of pre-trial motions; defense counsel consents to this request.

Respectfully submitted,

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Cc: Counsel (by ECF)